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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Cathy L. Waldor, U.S.M.J.  
:   
v. : Mag. No. 20-9215  
:   
JOSE MINAYA : **CRIMINAL COMPLAINT**  
:   
:   
:

I, Jill C. Lasseter, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the U.S. Department of Homeland Security – Homeland Security Investigations, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached page and made a part hereof.

by telephone  
\_\_\_\_\_  
Jill C. Lasseter, Special Agent  
U.S. Department of Homeland Security

Special Agent Lasseter attested to this Complaint  
by telephone pursuant to F.R.C.P. 4.1(b)(2)(A).

May 13, 2020  
Date

at New Jersey  
State

Honorable Cathy L. Waldor  
United States Magistrate Judge  
Name and Title of Judicial Officer

\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**  
**(Production of Child Pornography)**

In or around July 2019, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

JOSE MINAYA,

did knowingly use, persuade, induce, entice, or coerce any minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce, namely by computer.

In violation of Title 18, United States Code, Sections 2251(a) and (e) and Title 18, United States Code, Section 2.

**COUNT TWO**  
**(Distribution of Child Pornography)**

On or about October 5, 2019, in Passaic County, in the District of New Jersey, and elsewhere, the defendant,

JOSE MINAYA,

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, and using any means and facility of interstate and foreign commerce, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2).

**ATTACHMENT B**

I, Jill C. Lasseter, am a Special Agent with the United States Department of Homeland Security – Homeland Security Investigations (“HSI”). I am fully familiar with the facts set forth herein based on my own investigation, my discussions with other law enforcement officers, and my review of reports, documents, and other items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this Affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At all times relevant to this Complaint, defendant Jose Minaya (“MINAYA”) was a resident of Paterson, New Jersey.

2. In or around November 2019, HSI received information from a local law enforcement agency that an individual who was using screenname “jaysonfreak” had utilized an online messenger application to engage an eleven year old female (“Minor Victim-1”) in a sexually explicit conversation online in or around July 2019. During the conversation, “jaysonfreak,” inquired of Minor Victim-1 about her sexual history, or lack thereof. During the conversation, “jaysonfreak” requested that Minor Victim-1 take sexually explicit photographs of herself and send them to him through a separate application. Minor Victim-1 complied with the requests and took photographs of her buttocks and vagina, which she then sent to “jaysonfreak.”

3. The investigation revealed that the offending “jaysonfreak” profile utilized a profile picture of a young, Hispanic male, who law enforcement subsequently identified as MINAYA. The investigation also revealed that the account to which MINAYA instructed Minor Victim-1 to send the offending images was associated with an email address in MINAYA’s name, which was ultimately associated with MINAYA’s telephone number.

4. During the pendency of the above-investigation, law enforcement also learned that MINAYA had used a different social media application to upload a video of child pornography, which was publicly available. The video, which was approximately seven seconds in length, depicted an adult sexually assaulting a child.

5. The investigation revealed that MINAYA had uploaded the offending video from an IP address that was registered to his cellular telephone.